

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

HEATHER NELSON,

Plaintiff,

v.

Case No.: 11-cv-307

SANTANDER CONSUMER USA, INC.,
PATRICK K. WILLIS CO., INC.,
d/b/a AMERICAN RECOVERY SERVICE,
ASSETSBIZ CORP. d/b/a ABC RECOVERY,

Honorable Barbara B. Crabb

Defendants.

DEFENDANTS' PROPOSED ADDITIONAL VOIR DIRE QUESTIONS

Defendant Santander Consumer USA, Inc. ("Santander") Patrick K. Willis Co., Inc., d/b/a American Recovery Service ("ARS"), and AssetsBiz Corp. d/b/a ABC Recovery ("AssetsBiz" and with Santander and ARS, "Defendants"), by their attorneys, and pursuant to this Court's Preliminary Pretrial Conference Order, respectfully request that the Court ask the following voir dire questions to each prospective juror in addition to the Court's standard questions.

Proposed Additional Voir Dire Questions To Each Prospective Juror

1. Do you or any member of your family presently have a loan with Santander Consumer USA, Inc.? Have you ever?
2. Do you or any member of your family presently have a loan with HSBC? Have you ever?
3. Have you or any member of your family ever been involved in a dispute with any lender or creditor regarding unpaid, overdue, or incomplete payments on any loan?

- A. If so, can you describe the dispute?
 - B. Did you prevail on the dispute?
 - C. Can you remain impartial to Santander after having been involved in a dispute with your lender as described here today?
4. Have you or any member of your family ever received calls from lender or creditor regarding any unpaid, overdue, or incomplete payments on any loan?
- A. If so, from which lender?
 - B. How many calls did you receive?
 - C. Did your experience with that lender affect your ability to remain impartial in this case?
5. Have you or any member of your family ever received calls from a lender or creditor trying to contact someone else like, for example, a friend, another family member, or a neighbor?
- A. If so, from which lender?
 - B. How many calls did you receive?
 - C. Will your experience with that lender affect your ability to remain impartial in this case?
6. Have you or any member of your family ever had an automobile repossessed?
- A. If so, from which lender? From which repossession company?
 - B. Will your experience with that lender regarding collection efforts or the repossession affect your ability to remain impartial in this case?
7. Have you or any member of your family ever been employed by a financial institution (e.g. a bank, credit union, consumer finance firm) or a collection agency?
- A. If so, which institution?
 - B. What was your position?

- C. Did your experience at that institution affect your ability to remain impartial in this case?
8. Regarding financial institutions (such as banks, credit unions, consumer finance organizations), what is your assumption as to how they generally treat their customers?
9. Has the recent news regarding the United States economy affected your ability to remain impartial regarding a financial institution?

Dated: May 10, 2013

SANTANDER CONSUMER USA, INC.,
PATRICK K. WILLIS CO., INC., d/b/a
AMERICAN RECOVERY SERVICE
AND ASSETSBIZ CORP., d/b/a/ ABC
RECOVERY
Defendants

s/ Gary S. Caplan
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CERTIFICATE OF SERVICE

I, Gary S. Caplan, hereby state that on May 10, 2013, I electronically filed the foregoing DEFENDANTS' PROPOSED ADDITIONAL VOIR DIRE QUESTIONS with the Clerk of the Court using the ECF system, which will send notification to all parties.

By: /s/ Gary S. Caplan

Gary S. Caplan (IL ARDC No. 6198263)

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